

SEALED

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

GALVESTON DIVISION

United States Courts
Southern District of Texas
EII FD

NOV 28 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

1. CARLOS ALBERTO GUAJARDO
AKA "VIEJON"
AKA "CHATO"
2. ERIKA CASTILLO-GUAJARDO
3. CRISTIAN ALEXIS GUAJARDO
4. ABEL LONGORRIA-PENA
AKA "GABRIEL LONGORIA"
AKA "BORRADO"
5. ELOY GONZALEZ
6. CAMILO ANTONIO CARIDAD
7. CESAR RAMON FLORES
AKA "FAT BOY"
8. CRISTIAN MACIEL REBOLLEDO
AKA "TACO"
9. WILLIE JAMES CRAIG
AKA "BATMAN"
10. NAVONTE KELTRONE WHITE
11. ALEJANDRO GUERRA-BALLEZA
AKA "GORDO"
12. ELISEO GARZA-LOPEZ
13. CARLOS HERRERA-DIAZ
AKA "JUAN CARLOS"
14. JESUS GERARDO MARTINEZ
15. MARIA DEL PILAR
GOMEZ-RODRIGUEZ
16. ROSWELL OZUNA-ANZALDUA
17. JUAN FRANCISCO MALDONADO
18. ODWIN DODANIM PENA
19. CARLOS OMAR PENA-VARGAS
20. RODRIGO CELIS-ALMADA
AKA "CHELA"
21. MARTIN GERARDO LOPEZ
22. VICTOR HUGO GOMEZ
23. EMILIO RAMON TORRES
24. JOE ROY COCKERHAM
AKA "JAY"

CRIMINAL NUMBER _____

25. TAVIS LAMAR MILLER	§
26. LARRY JAMES WILLIAMS AKA "BLACK"	§
27. EDWIN MANUEL VIZCAINO	§
28. AWNI MINAYA AKA "CESAR"	§
29. CARLOS JOVANNI PENA JR. AKA "GIOVANNI"	§
30. MARIA DELCARMEN HERNANDEZ- MENDOZA	§
31. DEITHER OSVALDO TIJERINA- SCHWUCHOW	§
32. ANTHONY RAMONE COMPTON	§
33. GERARDO GARCIA	§
34. MIRIAM ALVAREZ AKA "MIA"	§
35. MARIA GUADALUPE GARCIA- ALVAREZ	§
36. CARLOS LIZARDI DEL VALLE AKA "YORKIE"	§
37. ALFONSO MARTINEZ AKA "MATRACA" AKA "LILO" AKA "FLACO"	§
38. FRANKLIN ERNESTO MARTINEZ- FERNANDEZ AKA "TILOS"	§
39. ELIEZER CASTILLO-MARTINEZ AKA "GALLO"	§
40. ALEX CASTILLO	§
41. MOISES CAMPOS-ESPINOSA AKA "CHICHE"	§
42. RICHARD DAVID ORTIZ AKA "JESUS GUZMAN" AKA "EL CULON"	§
43. DANERI SAET MALDONADO- GUILLEN	§
44. RODRIGO RODRIGUEZ	§
45. KEILA JOSEFINA PALOMO	§
46. DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX"	§
47. LOUIS YBARRA AKA "LOU"	§
48. RENE FRANCISCO PENA	§
49. DARRELL BREEDLOVE	§
50. KENNETH ROY JOHNSON AKA "K9"	§

51. COREY EUGENE LOVELL §
52. JUAN GONZALEZ-CARDEBAS §
53. OSCAR HERNANDEZ-CERVANTES §
54. ROLINDO HERNANDEZ §
55. GUSTAVO JIMENEZ §
AKA "JIMMY" §
56. ELMER ALEXANDER MACHADO §
AKA "MEME" §

United States Courts
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INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

During the period between February 1, 2016, and April 19, 2018, seven (7) groups of persons identified as, but not limited to, the defendants named in this Indictment operated in and out of the Southern Judicial District of Texas to distribute cocaine and heroin which had been smuggled into the United States from Colombia and Mexico. The leader of one of these groups, CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO", was the main source of cocaine and heroin smuggled into the United States and subsequently distributed in the Southern District of Texas and elsewhere throughout the United States by the seven (7) distribution cells identified in this Indictment. The cocaine and heroin were distributed through Houston, Texas, to Atlanta, Georgia; Buffalo and Manhattan, New York; Miami, Florida; New Orleans, Louisiana; and Norfolk, Virginia. The allegations in this Indictment focus on the drug trafficking and money laundering activities conducted by CARLOS ALBERTO GUAJARDO through the other defendants. Most of the distribution cells identified in this Indictment were composed of persons from Santo Domingo, Dominican Republic.

COUNT ONE

Between on or about February 1, 2016, and on or about April 19, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

[defendants 1,4-56]

1. CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
4. ABEL LONGORRIA-PENA AKA "GABRIEL LONGORIA" AKA "BORRADO",
5. ELOY GONZALEZ,
6. CAMILO ANTONIO CARIDAD,
7. CESAR RAMON FLORES AKA "FAT BOY",
8. CRISTIAN MACIEL REBOLLEDO AKA "TACO",
9. WILLIE JAMES CRAIG AKA "BATMAN",
10. NAVONTE KELTRONE WHITE,
11. ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
12. ELISEO GARZA-LOPEZ,
13. CARLOS HERRERA-DIAZ AKA "JUAN CARLOS",
14. JESUS GERARDO MARTINEZ,
15. MARIA DELPILAR GOMEZ-RODRIGUEZ,
16. ROSWELL OZUNA-ANZALDUA,
17. JUAN FRANCISCO MALDONADO,
18. ODWIN DODANIM PENA,
19. CARLOS OMAR PENA-VARGAS,
20. RODRIGO CELIS-ALMADA AKA "CHELA",
21. MARTIN GERARDO LOPEZ,
22. VICTOR HUGO GOMEZ,
23. EMILIO RAMON TORRES,
24. JOE ROY COCKERHAM AKA "JAY",
25. TAVIS LAMAR MILLER,
26. LARRY JAMES WILLIAMS AKA "BLACK",
27. EDWIN MANUEL VIZCAINO,
28. AWNI MINAYA AKA "CESAR",
29. CARLOS JOVANNI PENA JR. AKA "GIOVANNI",
30. MARIA DELCARMEN HERNANDEZ- MENDOZA,
31. DEITHER OSVALDO TIJERINA- SCHWUCHOW,
32. ANTHONY RAMONE COMPTON,
33. GERARDO GARCIA,
34. MIRIAM ALVAREZ AKA "MIA",
35. MARIA GUADALUPE GARCIA-ALVAREZ,
36. CARLOS LIZARDI DEL VALLE AKA "YORKIE",
37. ALFONSO MARTINEZ-SOTO AKA "MATRACA" AKA "LILO" AKA "FLACO",
38. FRANKLIN ERNESTO MARTINEZ- FERNANDEZ AKA "TILOS",
39. ELIEZER CASTILLO-MARTINEZ AKA "GALLO",
40. ALEX CASTILLO,

41. MOISES CAMPOS-ESPINOSA AKA "CHICHE",
42. RICHARD DAVID ORTIZ AKA "JESUS GUZMAN" AKA "EL CULON",
43. DANERI SAET MALDONADO- GUILLEN,
44. RODRIGO RODRIGUEZ,
45. KEILA JOSEFINA PALOMO,
46. DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX",
47. LOUIS YBARRA AKA "LOU",
48. RENE FRANCISCO PENA,
49. DARRELL BREEDLOVE,
50. KENNETH ROY JOHNSON AKA "K9",
51. COREY EUGENE LOVELL,
52. JUAN GONZALEZ-CARDEBAS,
53. OSCAR HERNANDEZ-CERVANTES,
54. ROLINDO HERNANDEZ,
55. GUSTAVO JIMENEZ AKA "JIMMY", and
56. ELMER ALEXANDER MACHADO AKA "MEME",

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown to the Grand Jury, to possess with intent to distribute controlled substances. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

Between on or about February 1, 2016, and on or about April 19, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

[defendants 1,3,4,8,11,12,16,17,18,36,37,41,56]

1. CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
3. CRISTIAN ALEXIS GUAJARDO,
4. ABEL LONGORIA-PENA AKA "GABRIEL LONGORIA" AKA "BORRADO",
8. CRISTIAN MACIEL REBOLLEDO AKA "TACO",
11. ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
12. ELISEO GARZA-LOPEZ,

16. ROSWELL OZUNA-ANZALDUA,
17. JUAN FRANCISCO MALDONADO,
18. ODWIN DODANIM PENA,
36. CARLOS LIZARDI DEL VALLE AKA "YORKIE",
37. ALFONSO MARTINEZ-SOTO AKA "MATRACA" AKA "LILO" AKA "FLACO",
41. MOISES CAMPOS-ESPINOSA AKA "CHICHE", and
56. ELMER ALEXANDER MACHADO AKA "MEME",

did knowingly and intentionally conspire and agree, with each other and with other persons known and unknown to the Grand Jury, to transport, transmit, and transfer monetary instruments and funds, that is, United States currency, which the defendants then well knew represented the proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute and the unlawful operation of an unlicensed money transmitting business, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activities, and to avoid a transaction reporting requirement under State or Federal Law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i), 1956 (a)(2)(B)(ii), and 1956(h).

COUNT THREE

Between on or about February 1, 2016, and on or about April 19, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

[defendants 1,2]

1. CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO", and
2. ERIKA CASTILLO-GUAJARDO,

did knowingly and intentionally conspire and agree, with each other and with other persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, then well knowing that the financial transactions involved the

proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute and the unlawful operation of an unlicensed money transmitting business, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful possession of controlled substances with intent to distribute and the unlawful operation of an unlicensed money transmitting business, and to avoid a transaction reporting requirement under State or Federal Law.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (a)(1)(B)(ii), and 1956(h).

COUNT FOUR

Between on or about February 1, 2016, and on or about April 19, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

[defendants 19, 22, 33]

19. CARLOS OMAR PENA-VARGAS,
22. VICTOR HUGO GOMEZ, and
33. GERARDO GARCIA,

did knowingly and intentionally conspire and agree, with each other and with other persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, then well knowing that the financial transactions involved the proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute and the unlawful operation of an unlicensed money transmitting business, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful possession of controlled substances with intent to distribute and the unlawful operation of an

unlicensed money transmitting business, and to avoid a transaction reporting requirement under State or Federal Law.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (a)(1)(B)(ii), and 1956(h).

COUNT FIVE

On or about February 4, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX",
KENNETH ROY JOHNSON AKA "K9", and
DARRELL BREEDLOVE,

did knowingly and intentionally possess with intent to distribute controlled substances. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately eleven (11) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; and 100 grams or more of a mixture or substance containing a detectable amount of heroin, that is, approximately 500 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIX

On or about July 14, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ABEL LONGORIA-PENA AKA "GABRIEL LONGORIA" AKA "BORRADO",
DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX", and
KENNETH ROY JOHNSON AKA "K9",

did knowingly and intentionally possess with intent to distribute controlled substances. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about August 15, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA “VIEJON” AKA “CHATO”,
and ELISEO GARZA-LOPEZ,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$340,890.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances and operating an unlicensed money transmitting business, from a place in the United States to or through a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

COUNT EIGHT

On or about February 14, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA “VIEJON” AKA “CHATO”,
ELOY GONZALEZ,
and CARLOS LIZARDI DEL VALLE AKA “YORKIE”,

did knowingly and intentionally possess with intent to distribute controlled substances. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately three (3) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT NINE

Between on or about February 15, 2017, and on or about February 23, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO,
ELOY GONZALEZ,
ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
ABEL LONGORIA-PENA AKA “GABRIEL LONGORIA” AKA “BORRADO”,
CARLOS LIZARDI DEL VALLE AKA “YORKIE”,
MOISES CAMPOS-ESPINOSA,
ELIEZER CASTILLO-MARTINEZ AKA “GALLO”,
and ALEX CASTILLO,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately thirteen (13) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN

On or about March 2, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ELMER ALEXANDER MACHADO AKA "MEME",
and GUSTAVO JIMENEZ AKA "JIMMY",

did knowingly and intentionally possess with intent to distribute controlled substances. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately fourteen (14) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT ELEVEN

Between on or about March 6, 2017, and on or about March 10, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
ABEL LONGORRIA-PENA AKA "GABRIEL LONGORIA" AKA "BORRADO",
CARLOS LIZARDI DEL VALLE AKA "YORKIE",
ALFONSO MARTINEZ-SOTO AKA "MATRACA" AKA "LILO" AKA "FLACO",
FRANKLIN ERNESTO MARTINEZ-FERNANDEZ AKA "TILOS",
MOISES CAMPOS-ESPINOSA AKA "CHICHE",
and ELIEZER CASTILLO-MARTINEZ AKA "GALLO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately seventeen (17) kilograms of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about May 22, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CESAR RAMON FLORES AKA “FAT BOY”,
ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
and JESUS GERARDO MARTINEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twenty (20) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

Between on or about June 2, 2017, and on or about June 4, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RICHARD DAVID ORTIZ AKA “JESUS GUZMAN” AKA “EL CULON”,
DANERI SAET MALDONADO-GUILLEN,
and RODRIGO RODRIGUEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately ten (10) kilograms of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about June 28, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
CRISTIAN MACIEL REBOLLEDO AKA "TACO",
WILLIE JAMES CRAIG AKA "BATMAN",
and NAVONTE KELTRON WHITE,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately ten (10) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about June 28, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
MARTIN GERARDO LOPEZ,
JOE ROY COCKERHAM AKA "JAY",
and MARIA DELCARMEN HERNANDEZ-MENDOZA,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twelve (12) kilograms of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

Between on or about June 28, 2017, and on or about July 1, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
and ROSWELL OZUNA-ANZALDUA,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$664,933.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances and operating an unlicensed money transmitting business, from a place in the United States to or through a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

COUNT SEVENTEEN

Between on or about June 29, 2017, and on or about July 6, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
and VICTOR HUGO GOMEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately ten (10) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

Between on or about July 1, 2017, and on or about July 2, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
MIRIAM ALVAREZ AKA "MIA",
LARRY JAMES WILLIAMS AKA "BLACK",
and TAVIS LAMAR MILLER,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately ten (10) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETEEN

On or about July 2, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LARRY JAMES WILLIAMS AKA "BLACK",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved more than five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two (2) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)B).

COUNT TWENTY

On or about July 2, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

TAVIS LAMAR MILLER,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved more than five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately three (3) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)B).

COUNT TWENTY-ONE

On or about July 6, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
EMILIO RAMON TORRES,
and TAVIS LAMAR MILLER,

did knowingly and intentionally possess with intent to distribute a controlled substance. This

violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately sixteen (16) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

On or about July 8, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
RODRIGO CELIS-ALMADA AKA “CHELA”,
and DEITHER TIJERINA-SCHWUCHOW,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twenty-two (22) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

On or about July 15, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZ AKA “GORDO”,
and CRISTIAN MACIEL REBOLLEDO AKA “TACO”,

did knowingly and intentionally possess with intent to distribute a controlled substance. This

violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

On or about July 16, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
and CARLOS HERRERA-DIAZ AKA “JUAN CARLOS”,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twenty-three (23) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

On or about July 16, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
and CRISTIAN MACIEL REBOLLEDO AKA “TACO”,

did knowingly and intentionally possess with intent to distribute a controlled substance. This

violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately ten (10) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

On or about July 22, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
CRISTIAN MACIEL REBOLLEDO AKA “TACO”,
JUAN FRANCISCO MALDONADO,
and ODWIN DODANIM PENA,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$194,734.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances and operating an unlicensed money transmitting business, from a place in the United States to or through a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

COUNT TWENTY-SEVEN

On or about July 24, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
and ALEJANDRO GUERRA-BALLEZA AKA "GORDO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved more than five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately three (3) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)B), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

On or about September 7, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZ AKA "GORDO",
and MARIA DELPILAR GOMEZ-RODRIGUEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately fourteen (14) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

On or about September 7, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

CRISTIAN MACIEL REBOLLEDO AKA "TACO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY

On or about September 10, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RICHARD DAVID ORTIZ AKA "JESUS GUZMAN" AKA "EL CULON",
and DANERI SAET MALDONADO-GUILLEN,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately six (6) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

On or about September 11, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
and MARIA DELPILAR GOMEZ-RODRIGUEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately sixteen (16) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

On or about September 13, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
and MARTIN GERARDO LOPEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two (2) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

On or about September 19, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
LARRY JAMES WILLIAMS AKA "BLACK",
and ANTHONY RAMONE COMPTON,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately three (3) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY-FOUR

On or about September 19, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
and CAMILO ANTONIO CARIDAD,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately seven (7) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

Between on or about September 15, 2017, and on or about September 20, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX",
RENE FRANCISCO PENA,
LOUIS YBARRA AKA "LOU",
JUAN GONZALEZ-CARDEBAS,
OSCAR HERNANDEZ-CERVANTES,
ROLINDO HERNANDEZ,
and COREY EUGENE LOVELL,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately eighteen (18) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

On or about October 31, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
and LARRY JAMES WILLIAMS AKA "BLACK",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two and five-tenths (2.5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled

substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY-SEVEN

On or about November 3, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
CARLOS JOVANNI PENA JR. AKA "GIOVANNI",
and EDWIN MANUEL VIZCAINO,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two (2) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY-EIGHT

Between on or about November 5, 2017, and on or about November 6, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
and TAVIS LAMAR MILLER,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately eight (8) kilograms of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 846, 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-NINE

On or about November 8, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
ELOY GONZALEZ,
and DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately four (4) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FORTY

Between on or about November 8, 2017, and on or about November 12, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

DIMITRIAUS PETERSON AKA "MEECH" AKA "KING HOENIX",
and LOUIS YBARRA AKA "LOU",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately eleven (11) kilograms of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-ONE

Between on or about November 5, 2017, and on or about November 13, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
VICTOR HUGO GOMEZ,
and GERARDO GARCIA,

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twenty (20) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-TWO

On or about November 11, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

CARLOS OMAR PENA-VARGAS,
MARIA GUADALUPE GARCIA-ALVAREZ,
and RODRIGO CELIS-ALMADA AKA "CHELA",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved one (1) kilogram or more of a mixture or substance containing a detectable

amount of heroin, that is, approximately three (3) kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-THREE

On or about April 19, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ELISEO GARZA-LOPEZ,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$225,640.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances and operating an unlicensed money transmitting business, from a place in the United States to or through a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

NOTICE OF CRIMINAL FORFEITURE
(21 U.S.C. § 853(a))

Pursuant to Title 21, United States Code, Section 853(a), the United States of America

gives notice to the defendants,

[defendants 1,4-56]

1. CARLOS ALBERTO GUAJARDO AKA “VIEJON” AKA “CHATO”,
4. ABEL LONGORIA-PENA AKA “GABRIEL LONGORIA” AKA “BORRADO”,
5. ELOY GONZALEZ,
6. CAMILO ANTONIO CARIDAD,
7. CESAR RAMON FLORES AKA “FAT BOY”,
8. CRISTIAN MACIEL REBOLLEDO AKA “TACO”,
9. WILLIE JAMES CRAIG AKA “BATMAN”,
10. NAVONTE KELTRONE WHITE,
11. ALEJANDRO GUERRA-BALLEZA AKA “GORDO”,
12. ELISEO GARZA-LOPEZ,
13. CARLOS HERRERA-DIAZ AKA “JUAN CARLOS”,
14. JESUS GERARDO MARTINEZ,
15. MARIA DELPILAR GOMEZ-RODRIGUEZ,
16. ROSWELL OZUNA-ANZALDUA,
17. JUAN FRANCISCO MALDONADO,
18. ODWIN DODANIM PENA,
19. CARLOS OMAR PENA-VARGAS,
20. RODRIGO CELIS-ALMADA AKA “CHELA”,
21. MARTIN GERARDO LOPEZ,
22. VICTOR HUGO GOMEZ,
23. EMILIO RAMON TORRES,
24. JOE ROY COCKERHAM AKA “JAY”,
25. TAVIS LAMAR MILLER,
26. LARRY JAMES WILLIAMS AKA “BLACK”,
27. EDWIN MANUEL VIZCAINO,
28. AWNI MINAYA AKA “CESAR”,
29. CARLOS JOVANNI PENA JR. AKA “GIOVANNI”,
30. MARIA DELCARMEN HERNANDEZ- MENDOZA,
31. DEITHER OSVALDO TIJERINA- SCHWUCHOW,
32. ANTHONY RAMONE COMPTON,
33. GERARDO GARCIA,
34. MIRIAM ALVAREZ AKA “MIA”,
35. MARIA GUADALUPE GARCIA-ALVAREZ,
36. CARLOS LIZARDI DEL VALLE AKA “YORKIE”,
37. ALFONSO MARTINEZ-SOTO AKA “MATRACA” AKA “LILO” AKA “FLACO”,
38. FRANKLIN ERNESTO MARTINEZ- FERNANDEZ AKA “TILOS”,
39. ELIEZER CASTILLO-MARTINEZ AKA “GALLO”,
40. ALEX CASTILLO,
41. MOISES CAMPOS-ESPINOSA AKA “CHICHE”,
42. RICHARD DAVID ORTIZ AKA “JESUS GUZMAN” AKA “EL CULON”,
43. DANERI SAET MALDONADO- GUILLEN,
44. RODRIGO RODRIGUEZ,

45. KEILA JOSEFINA PALOMO,
46. DIMITRIAUS PETERSON AKA "MEECH" AKA "KING PHOENIX",
47. LOUIS YBARRA AKA "LOU",
48. RENE FRANCISCO PENA,
49. DARRELL BREEDLOVE,
50. KENNETH ROY JOHNSON AKA "K9",
51. COREY EUGENE LOVELL,
52. JUAN GONZALEZ-CARDEBAS,
53. OSCAR HERNANDEZ-CERVANTES,
54. ROLINDO HERNANDEZ,
55. GUSTAVO JIMENEZ AKA "JIMMY", and
56. ELMER ALEXANDER MACHADO AKA "MEME",

that upon conviction of conspiracy as charged in Count ONE of the Indictment, the following property, whether real or personal, is subject to forfeiture:

- 1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such conspiracy; and
- 2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such conspiracy.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

[defendants 1-4,8,11,12,16-19,22,33,36,37,41,56]

1. CARLOS ALBERTO GUAJARDO AKA "VIEJON" AKA "CHATO",
2. ERIKA CASTILLO-GUAJARDO,
3. CRISTIAN ALEXIS GUAJARDO,
4. ABEL LONGORRIA-PENA AKA "GABRIEL LONGORIA" AKA "BORRADO",
8. CRISTIAN MACIEL REBOLLEDO AKA "TACO",
11. ALEJANDRO GUERRA-BALLEZA AKA "GORDO",
12. ELISEO GARZA-LOPEZ,
16. ROSWELL OZUNA-ANZALDUA,
17. JUAN FRANCISCO MALDONADO,
18. ODWIN DODANIM PENA,
19. CARLOS OMAR PENA-VARGAS,
22. VICTOR HUGO GOMEZ,
33. GERARDO GARCIA,

36. CARLOS LIZARDI DEL VALLE AKA "YORKIE",
37. ALFONSO MARTINEZ-SOTO AKA "MATRACA" AKA "LILO" AKA "FLACO",
41. MOISES CAMPOS-ESPINOSA AKA "CHICHE", and
56. ELMER ALEXANDER MACHADO AKA "MEME",

that, upon conviction of a conspiracy in violation of Title 18, United States Code, Section 1956(h), a violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) or (ii), or of a violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) or (ii), as charged in Counts TWO, THREE, FOUR, SEVEN, SIXTEEN, TWENTY-SIX, and FORTY-THREE of the Indictment, all property, real or personal, involved in such money laundering offenses or traceable to such property, is subject to forfeiture to the United States.

PROPERTY SUBJECT TO FORFEITURE

The property to be forfeited includes, but is not limited to, approximately \$10 million in United States currency.

MONEY JUDGMENT

Defendants are notified that upon conviction, a money judgment may be imposed equal to the value of the property subject to forfeiture, for which the defendants may be jointly and severally liable.

SUBSTITUTE ASSETS

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendants

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty,

the United States will seek to forfeiture any other property of the defendants up to the total value of the property subject to forfeiture, pursuant to Title 21, United States Code, Section 853(p), and Title 18, United States Code, Section 982(b).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY

By:


KENNETH A. CUSICK
Assistant United States Attorney